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(D. Fromani)

September 22, 2005

John F. Carter  
Regional Director  
Federal Deposit Insurance Corporation  
25 Jessie Street at Ecker Square  
San Francisco, CA 94101

Dear Mr. Carter,

Our state trade association, the Oklahoma Bankers Association, has submitted a letter of comment regarding the application by Wal-Mart for a bank charter and I want to state our emphatic concurrence with their position. The letter from Mr. Roger Beverage, President and CEO of the Association reads as follows:

*We are concerned about the ramifications of Wal-Mart Bank and the breach in the wall of separation between banking and commerce that approval of this application would present. Wal-Mart is the largest commercial firm in the word, and its entry into the banking industry could have a dramatic, negative impact on the banking system and those it serves.*

*Wal-Mart claims it will use its charter to process credit and debit cards and electronic check transactions from its stores. Importantly, it has not denied that it will ultimately pursue retail-banking services in the future. In fact, the application indicates it will offer certificates of deposit to certain organizations right away; a strong indication that more expanded offerings cannot be far behind.*

*It's history of trying to acquire a bank charter in 1999, 2001 and 2002 is more evidence that Wal-Mart plans to enter the retail banking market, which puts it right in the center of the "mixing banking and commerce" firestorm. The company is well known for entering a community, driving out local competition through predatory pricing (raising those same prices when competitors are forced to close) and thus becoming the new "shopping district" for the community.*

*It results in a monopoly for the company, and there's absolutely no reason to assume that its approach to retail banking will be any different. Small business would be forced to seek solution on both the retail and banking side from one provider - Wal-Mart - and therein*

*lies the inherent conflict of interest that underlies the ban on mixing banking and commerce.*

*How could a Wal-Mart bank view lending to a competing retail business of any sort? Not very well. And certainly no new competing business would want to share its plans with the giant competitor that has destroyed all of its predecessors.*

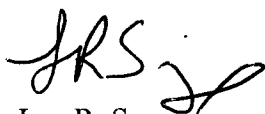
*Moreover, if this application is approved, Wal-Mart will have an incredible advantage over other banks, because banks cannot engage in commercial activities to offset the competitive pressures from the Wal-Mart conglomerate. Why should the world's largest retailer be permitted to do what local banks cannot do (combine with non-financial retail businesses) to serve their communities?*

*As importantly, Wal-Mart would not be subject to the Federal Reserve's regulatory and supervisory requirements that apply to bank holding companies. This would be true because of the loophole in the bank holding company act that exempts commercial firms that own industrial banks from the act's requirements. This lack of umbrella supervision would be bound to raise serious safety and soundness concerns.*

*The comment letter filed by the sound banking coalition, dated August 17, 2005, and that can be found at [www.FDIC.GOV](http://www.FDIC.GOV) encapsulates the concerns that we have in much more detail. Wal-Mart's application would impose an unacceptable risk to the banking system and its regulatory safety net. This proposed expansion is not in the ultimate best interest of the consumer and would ignore the congressional mandate of separating banking and commerce.*

*The Wal-Mart application should be denied.*

Sincerely,

A handwritten signature in dark ink, appearing to read 'LRS' followed by a stylized flourish.

Lee R. Symcox  
President and CEO